

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA	:	
	:	
Plaintiff,	:	
	:	
v.	:	WMN 02 CV 754
	:	
JOHN RACHEL, et al.	:	
	:	
Defendants.	:	

DEFENDANTS' CROSS MOTION FOR SUMMARY JUDGMENT ON DAMAGES

Defendants John Rachel *et al* move for summary judgment on damages pursuant to Fed. R. Civ. P. 56. The grounds for this motion are set forth in the attached Memorandum.

Respectfully submitted,

S/Edward J. Tolchin
Edward J. Tolchin
Fettmann, Tolchin & Majors, P.C.
10509 Judicial Drive, Suite 300
Fairfax, VA 22030
703-385-9500
703-385-9893 (facsimile)
etolchin@ftm-pc.com
Counsel for Defendants

Certificate of Service

I hereby certify that on this 18th day of March 2004, I filed the Defendants' Cross-Motion for Summary Judgment on Damages, with all exhibits thereto, via first class mail, postage prepaid, on: Tamera L. Fine, Assistant United States Attorney, 6625 United States Courthouse, 101 W. Lombard Street, Baltimore, Maryland 21401. I also filed the aforementioned pleading electronically with the Court and served a copy by the same means on all counsel of record.

S/Edward J. Tolchin

Edward J. Tolchin